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Counsel for Defendant
Jizhong Chen

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No.: CR 19-00056 EJD

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE STATUS CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from January 25, 2021, to March 15, 2021.

This is a complex case with voluminous discovery, including discovery productions from the Government in April, May, and October 2020. The government also intends to produce additional discovery in the coming weeks. Further, the stay-at-home orders governing California and the Bay Area counties, General Order 72-2, and other circumstances driven by the COVID-19 global health crisis have prevented defense counsel for the past ten months from meeting in person with his client

1 or with potential witnesses and experts. The stay-at-home orders have also prevented defense
2 counsel from conducting any meaningful defense investigation.

3 The parties agree that the time between January 25, 2021, and March 15, 2021, should be
4 excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of
5 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
6 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
7 3161(h)(7)(A) and (B)(iv).
8

9 For the foregoing reasons, the parties stipulate to continue the status conference to March 15,
10 2021.

11 IT IS SO STIPULATED
12

13 Dated: January 11, 2021

NOLAN BARTON & OLMOS LLP

14 /S/ Daniel B. Olmos

15 Daniel B. Olmos

16 Attorney for Defendant Jizhong Chen
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18
19 Dated: January 11, 2021

David L. Anderson, United States Attorney

20 /S/ Marissa Harris

21 By: Marissa Harris

22 Assistant United States Attorney
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3 UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 SAN JOSE DIVISION
6

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8 UNITED STATES,

9 Plaintiff,

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11 JIZHONG CHEN,


12 Defendant.
13
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Case No.: CR 19-00056 EJD

~~[PROPOSED]~~ ORDER TO CONTINUE
STATUS CONFERENCE

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16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for January 25, 2021, be continued to March 15, 2021, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between
19 January 25, 2021, and March 15, 2021, shall be excluded from calculations under the Speedy Trial
20 Act. The interests of justice in allowing for the effective preparation of the defense and continuity of
21 counsel outweigh the best interest of the public and the defendant in a speedy trial, taking into
22 account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).
23

24 Dated: 1/12/2021

25 
26 The Hon. Edward J. Davila
27 United States District Judge
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